SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD

EXECUTIVE OFFICER'S REPORT

October 13, 2004

PART A
SAN DIEGO REGION STAFF ACTIVITIES *(Staff Contact)*

1. Industrial Environmental Association (IEA) Water Committee Meeting (*Tony Felix*)
On September 9, 2004, Tony Felix, Water Resource Control Engineer with the Industrial Compliance Unit, was invited to speak at the Industrial Environmental Association's (IEA) 2004 Annual Water Committee Meeting in Carlsbad. About 25 people, mostly from the biotechnology sector, attended the meeting. Tony discussed the State Board's draft General Industrial Storm Water Permit, the responsibilities of the Industrial Compliance Unit, and the requirements in the Municipal Storm Water Permit as it relates to industrial dischargers.

The State Board's General Industrial Storm Water Permit, Order No. 97-03-DWQ expired in April 2002. A draft Order renewal was made available in June 2003. The draft Order includes revisions to the Storm Water Pollution Prevention Plan, the Monitoring and Reporting Program, and the Conditional Exclusion requirements. As of the date of this report, the State Water Resources Control Board has not scheduled a hearing to consider adoption of the draft Order.

For the past year and a half there have been considerable efforts between the Industrial Compliance Unit and the Municipal Storm Water copermittees to coordinate joint industrial compliance inspections in order to avoid duplicate inspection attempts and to attain standards of consistency.

2. Enforcement Workshop at UC Davis September 22 & 23, 2004 (*Mark Alpert*)
On September 22 & 23, 2004 Art Coe, Mike McCann, Megan Quigley, and Mark Alpert represented the San Diego Regional Board at the first annual enforcement workshop entitled *More than Pollution: Fraud and Other Water Crimes.* The State Board's Training Academy, the California District Attorneys Association and UC Davis jointly hosted the workshop. Participants ranged from enforcement staff and attorneys from the State and Regional Boards, other Cal/EPA Boards and Departments, Deputy District Attorneys, Fish and Game, and Circuit Prosecutors from around the State. Cal/EPA Secretary Terry Taminen was the keynote speaker.

The purpose of the workshop was to focus attention on environmental crimes, with an emphasis on Fraud and Special waters. The workshop also brought attention to needed coordination between Enforcement staff within Cal/EPA, District Attorneys, Fish and Game, and environmental task force groups that meet throughout the State.

PART B
SIGNIFICANT REGIONAL WATER QUALITY ISSUES

1. Sanitary Sewer Overflows (SSO) *(Charles Cheng, David Hanson, Bryan Ott, Victor Vasquez) (Attachment B-1)*

From September 1 to September 30, 2004, there were 23 sanitary sewer overflows (SSOs) from publicly-owned collection systems reported to the Regional Board office; 15 of these spills reached surface waters or storm drains of which none resulted in closure of recreational waters. Of the total number of overflows from public systems, one was 1,000 gallons or more.

Nine sewage overflows from private property in August were also reported; two of these overflows were 1,000 gallons or more; five reached surface waters or storm drains; and two resulted in closure of recreational waters.

The combined total volume of reported sewage from all publicly-owned collection systems for the month of August was 6,709 gallons.

Trace rainfall was recorded at San Diego's Lindbergh Field in September 2004. For comparison, in August 2004, no rainfall was recorded, and 19 public SSOs were reported. Also for comparison, in September 2003, trace rainfall was recorded and 13 public SSOs were reported.

Attached is a table entitled "Sanitary Sewer Overflow Statistics," updated through September 30, 2004 which contains a summary of all sanitary sewer overflows (by FY) from each agency since FY 2001-02. From July 1, 2004 through September 30, 2004, approximately 33.4 billion gallons of sewage were conveyed through the Region's sewage collection systems of which 74,489 gallons were spilled (0.0002%).

The Regional Board has updated the sewer overflow statistics for fiscal year (FY) 2003-2004 for each sewer agency and summarized the results in the attached table entitled "Public SSO Statistics Summary for FY 2003-2004 (July 1-June 30)." A comparison of FY 2002-2003 to FY 2003-2004 SSO statistics is summarized in the following table. As shown, there was a 35% reduction in the total number of SSOs and average number of SSOs per 100 miles of collection system. Although there was a 390% increase in the total SSO volume, that was primarily due to a 4.9 million gallon spill experienced by the City of San Diego and a 1.5 million gallon spill experienced by the City of Oceanside.

	FY 2001-2002	FY 2002-2003	FY 2003-2004
Total # SSOs	447	426	275
Average # SSOs per 100 mi	5.4	4.8	3.0
Total SSO Volume (million gallons)	3.3	2.1	8.2
Total SSO Vol. Recovered (million gallons)	1.3	0.3	2.0
Average SSO Vol. % Recovered	45	43	40

Issuance of Notice of Violation (NOV)
One Notice of Violation (NOV) was issued during the month of September 2004 for a significant SSO from a private entity.

Aliso Creek Villas Homeowners Association
The El Toro Water District (ETWD) notified this office of a 1,800-gallon sanitary sewer overflow that occurred on August 17, 2004 at 23288 Orange Avenue in Lake Forest from the wastewater collection system owned, operated or maintained by Aliso Creek Villas Homeowners Association (ACVHOA). A report from ETWD indicates that the cause of the sanitary sewer overflow was a sewer line blockage due to grease. The report from ETWD and a report from the County of Orange Health Care Agency indicate that the overflow entered a storm drain, Aliso Creek and the Pacific Ocean. The overflow resulted in the closure of ocean recreational waters along a section of Aliso Beach at Aliso Creek in Laguna Beach. A request for additional information has been sent to ACVHOA regarding this spill, including a request for a report of the actions ACVHOA has taken to prevent future spills.

2. Clean Water Act Section 401 Water Quality Certification Actions Taken in September 2004 *(Stacey Baczkowski) (Attachment B-2)*
Section 401 of the Clean Water Act requires that any person applying for a federal permit or license which may result in a discharge of pollutants into waters of the United States, must obtain a state water quality certification that the activity complies with all applicable water quality standards, limitations, and restrictions. The majority of project applications are submitted because the applicant is also applying for a section 404 permit from the Army Corps of Engineers, and propose filling or armoring of creeks and streams. See attached table.

Public notification of pending 401 Water Quality Certification applications can be found on our web site at: http://www.swrcb.ca.gov/rwqcb9/programs/401cert.html.

3. Poway Creek Silt Removal and Access Ramp Project (*Mike Porter)*
The City of Poway has applied for section 401 Water Quality Certification for the Poway Creek Silt Removal and Access Ramp Project. The proposed project includes an unspecified amount of dredging over a ten-year period to restore and maintain capacity for 100-year storm flows within portions of Rattlesnake and Poway Creeks. The City has also proposed construction of three sediment detention basins in the Poway Creek bed, and the construction of one permanent, heavy equipment access ramp on the north bank of Poway Creek.

The City of Poway previously submitted the same project in 2002 and was denied certification on April 15, 2003. The application was denied due to the proposed conversion of Poway Creek into a structural best management practice (BMP) through the construction of three sediment basins; lack of specificity regarding the proposed 10-year sediment removal; lack of a discussion and analysis of impacts to water quality and beneficial uses from ongoing sediment removal; lack of an analysis of the current

sediment budget within Poway and Rattlesnake Creeks and an understanding of how sediment moves within these creeks; lack of appropriate mitigation; and lack of appropriate California Environmental Quality Act (CEQA).

The current project application has addressed some of the concerns that resulted in a denial of the original project application. The City of Poway has provided more information on the location and design of the sediment basins and has conducted a hydrological analysis to determine what channel capacity is necessary to convey a 100-year storm event. However, the City has failed to identify a sediment budget for the project area, appropriate mitigation, alternatives to sediment basins, and specific impacts to water quality and beneficial uses due to an unspecified number of dredging events over a 10 year period and the installation of sediment basins.

The CEQA document prepared for this project cannot be used to assess impacts to water quality and beneficial uses. The City of Poway prepared an addendum to the original Mitigated Negative Declaration, but the addendum also fails to analyze impacts to water quality and beneficial uses from the proposed project.

The Regional Board has informed the City of Poway that we recommend denial of the proposed project as the City has failed to demonstrate that the proposed project will protect water quality and beneficial uses. We have requested a meeting with the City of Poway to determine if they are interested in pursing their application in a hearing before the Regional Board.

4. Grants Update *(Deborah Woodward)*

2003 Consolidated Grants Program Update

The Regional Board is finalizing grant agreements for the few remaining Consolidated Grants program projects. Grant agreements for all but one project should be complete by November 2004. The one San Diego Region project that remains to be authorized is the Rainbow Creek Nutrient TMDL Implementation project recommended for federal Clean Water Act Section 319 funding. A grant agreement for this federally funded project will be negotiated as soon as the State Water Resources Control Board (SWRCB) receives its grant from the US EPA.

Status of Phase I and Phase II Proposition 13 Grant Funded Projects

The two projects that were previously behind schedule are making progress toward returning to schedule. The City of San Diego Los Penasquitos Watershed Management Plan and the Orange County Munger Storm Drain project are nearly up to date on past-due submittals. Most of the other projects funded by Proposition 13 Phase I and II are on track, even ahead of schedule, but the Regional Board has identified and is working with several grantees whose projects appear to be in danger of falling behind.

Agricultural Water Quality Grant Program (AWQGP) and Federal Clean Water Act Section 319 Nonpoint Source Implementation Grant Program (Section 319)
The SWRCB is currently accepting applications for the AWQGP and Section 319 grant programs. The AWQGP grant program, funded by Propositions 40 and 50, provides $40.9 million statewide for projects that define, reduce, or eliminate the discharge of agricultural pollutants from irrigated lands. The Section 319 grant program provides approximately $5.5 million statewide for projects that reduce nonpoint source pollution. In the current funding cycle, the Section 319 program will give priority to projects that address agricultural pollutants from irrigated lands, but projects that address other categories of nonpoint source pollution will be considered. Applications for both grant programs are due November 10, 2004 and must be submitted electronically in accordance with the Solicitation Notice and grant program guidelines posted on the SWRCB website at http://www.swrcb.ca.gov/funding/awqgp/index.html .

Proposition 50 Integrated Regional Water Management (IRWM) Grant Program
The IRWM grant program is funded by Proposition 50 and administered jointly by the Department of Water Resources and SWRCB. The program will provide $380 million in two funding cycles for projects that protect communities from drought, protect and improve water quality, and improve local water security by reducing dependence on imported water. The first funding cycle will make $160 million available, $10 million for planning projects and $150 million for implementation projects.

The IRWM grant program has stringent eligibility criteria that limit funding to regional water management efforts. Eligibility criteria and details of the application process are described in the draft IRWM grant program guidelines posted at http://www.swrcb.ca.gov/funding/irwmgp/index.html. The period for public comment on these draft guidelines ended September 30, 2004. Final IRWM guidelines and Proposal Solicitation Package are expected to be released in November, with Planning Grant proposals due in January 2005 and Implementation Grant proposals due in February 2005. Application workshops will be held in November 2004 to assist applicants preparing proposals.

Water Recycling Funding Program (WRFP)
The WRFP, funded mainly by Proposition 50, will provide approximately $42M statewide in this current funding cycle for the planning, design, and construction of water recycling projects. The final draft guidelines for the WRFP will be considered for adoption by the SWRCB on October 21, 2004, and are posted at http://www.swrcb.ca.gov/recycling/draftguidelines/index.html. Applications will be accepted upon adoption of the WRFP guidelines, and the SWRCB expects to adopt a draft Competitive Project List in January 2005.

Small Community Wastewater Grant Program (SCWG)
The SWRCB Division of Financial Assistance is developing the proposed statewide Competitive Project List to determine which projects will be able to compete for SCWG funding. Only one project, from the Anza Facilities District, was submitted from the San

Diego Region. More information about this grant program can be found at http://www.swrcb.ca.gov/cwphome/scwg/index.html.

5. Petroleum Fuel Release Discovered *(Laurie Walsh)*

The City of San Diego recently notified the Regional Board that petroleum hydrocarbon from an unauthorized release was discovered in the vicinity of a sewer pipeline installation project. Their project location is within the City's right of way on the BNSF Railroad property located at the corner of Crosby Road and Harbor Drive in San Diego. During the City's dewatering efforts to recover a drilling head used during their pipeline project they encountered a petroleum hydrocarbon release. Approximately, 70,000 gallons of ground water were extracted during the dewatering efforts with about 50% (35,000 gallons) of it in the form of free phase petroleum hydrocarbons. The City is currently testing the ground water/fuel mixture to determine the type of petroleum hydrocarbon.

In an effort to determine the party(ies) responsible for the release, the Regional Board sent a letter, under the authority of CWC Section 13267, on September 20, 2004 directing several potentially responsible parties to submit to the Executive Officer any information their companies have regarding any tanks, piping, and/or historic spill information located within a ½ mile radius of the City's Manhole #3 (the point of discovery). The Regional Board requested submittal of information by October 11, 2004.

The letter was sent to Mr. Greg Rousseau with Burlington Northern and Santa Fe Railway Company, Mr. Paul Brown with the Port of San Diego, Mr. Craig Bishop with Kinder Morgan, Mr. Dale Holder with WesPac Pipelines, LTD, Mr. Paul Coons with Chevron - San Diego Bulk Terminal, Ms. Cheryl Lester with the City of San Diego, Hazardous Materials Program, Riyadh Makani with the City of San Diego, Engineering Department, Mr. Ted Olson with the City of San Diego Underground Tank Program, and Mr. Frank Nguyen also with the City of San Diego Engineering Department.

6. San Diego Municipal Storm Water Permit Re-issuance *(Phil Hammer)*

In mid-October, the Regional Board will meet with representatives of the Copermittees to discuss the re-issuance process for the San Diego Municipal Storm Water Permit (Permit), which is tentatively scheduled for re-issuance in February 2006. At the meeting, the Regional Board will discuss its expectations regarding the information to be included in the Report of Waste Discharge. The Report of Waste Discharge is essentially the Copermittees' application for re-issuance of the Permit, to be used by the Regional Board during the redrafting of the Permit. The information to be included in the Report of Waste Discharge is expected to serve as the basis for a series of meetings between the Regional Board and the Copermittees, which will be held prior to the time the Report of Waste Discharge is due for submittal in August 2005. The series of meetings will provide the opportunity for the Regional Board and the Copermittees to discuss the form and content of the new Permit. Following these initial meetings with the Copermittees, the Regional Board plans to conduct workshops to provide the opportunity for input on the Permit from all stakeholders.

7. Issuance of Cleanup and Abatement Order No. R9-2004-0258, Allegheny Technologies Inc., and TDY Industries *(Sabine Knedlik)*

On October 4, 2004 the Executive Officer issued Cleanup and Abatement Order (CAO) No. R9-2004-0258 to Allegheny Technologies Inc. and TDY Industries (a wholly owned subsidiary of Allegheny Technologies Inc.). The CAO directs Allegheny Technologies Inc. and TDY Industries to cleanup and abate discharges of polychlorinated biphenyls (PCBs), heavy metals, and volatile organic chemicals, both to land and San Diego Bay, from a site formally occupied by Teledyne Ryan Aeronautical at 2710 North Harbor Drive in San Diego, California (hereinafter "the Site"). Allegheny Technologies Inc. and TDY Industries acquired ownership of Teledyne Ryan Aeronautical in a series of mergers, which concluded in 1999.

During the early 1940s through mid 1999, Teledyne Ryan Aeronautical operated an aerospace component manufacturing operation at the Site located between the San Diego International airport to the north and Convair Lagoon in San Diego Bay to the south. Storm water discharges from the Site are discharged through Storm Water Conveyance Systems (SWCS) that drain to Convair Lagoon and San Diego Bay.

In 1986, the Regional Board found that Teledyne Ryan Aeronautical contributed to a condition of pollution in Convair Lagoon by discharging waste containing PCBs, several trace metals, and volatile organic compounds into and from the SWCS to San Diego Bay. The Regional Board issued Cleanup and Abatement Order (CAO) No. 86-92 with amendments, directing Teledyne Ryan Aeronautical to terminate discharges of waste and to remediate the contaminated marine sediment in Convair Lagoon.

In 1998, in response to CAO No. 86-92 and amendments, a sand cap was constructed in Convair Lagoon to physically isolate PCB contaminated marine sediments from aquatic life in San Diego Bay. During the same year, the Regional Board adopted Order No. 98-21 for Teledyne Ryan Aeronautical to establish requirements for the long-term maintenance and monitoring of the sand cap, including sediment sampling and analysis, SWCS sampling and analysis, and visual inspections. Work to cleanup and/or replace portions of the SWCS at the Site was concluded in 1998.

Manufacturing operations ceased in 1999 and the Site was vacated by 2002. PCB concentrations have continued to be found in the SWCS in sampling events conducted after the cleanup and/or replacement of the onsite SWCS in 1998. SWCS sampling was conducted at various times between 1999 – 2003 by the Port of San Diego and Allegheny Technologies Inc. PCB concentrations were found in the majority of the sediment samples taken from the SWCS. PCBs found in the SWCS are conveyed and discharged to Convair Lagoon and San Diego Bay during storm events. These discharges are resulting in the accumulation of PCBs on the surface of the Convair Lagoon Sand Cap. In addition, threats to the San Diego Bay water quality exist from past discharges of chlorinated solvents (primarily trichloroethylene and tetrachloroethylene) and hexavalent chromium to soil and ground water at the Site.

The CAO issued to Allegheny Technologies Inc. and TDY Industries requires a comprehensive soil, ground water, and SWCS investigation to identify and ultimately remove or remediate the source(s) of PCBs, chlorinated solvents, and hexavalent chromium discharges. Staff will provide periodic status reports to the Regional Board on Allegheny Technologies Inc. and TDY Industries responsiveness to the CAO and the progress of remediation efforts at the Site.

8. City of San Diego – U.S. Marine Corps Air Station (MCAS) Miramar Peak Discharge Flow Status *(David Hanson)*

For the past several years, the City of San Diego (City) has experienced high inflow of stormwater flows from MCAS Miramar into its sanitary sewage collection system. Several potential causes of the high inflow have been identified within the Base, including runoff from large paved areas routed into the City's sanitary sewage collection system. During rain events, the City has measured peak sewer line flow rates from MCAS Miramar and tributaries that exceed the capacity of the City's trunk line servicing the area by up to 3 million gallons per day. To avoid sewage spills during these peak flows, prior to each major rain event, the City sets up temporary bypass pumps to divert a portion of the flow to a separate trunk line. If the pumps or temporary piping were to fail during a significant rain event, a sewage spill into Rose Canyon and Mission Bay would likely occur. The current situation presents a significant threat to water quality in the Region.

The Regional Board has met with staff of the USEPA, City, and MCAS Miramar a number of times over the past 2 years in an attempt to facilitate the reduction of excessive stormwater inflow into the City's sewage collection system. During the most recent meeting on September 15, 2004, MCAS Miramar staff provided an update of actions they have taken and plan to take to reduce inflow and infiltration. Although MCAS Miramar models predict completed actions will significantly reduce inflow, data from actual storm events are needed to determine the extent of the reductions. MCAS Miramar plans to monitor flows in their connections to the City's sewage collection system during this rainy season to determine the effect of their actions. Regional Board staff will continue to monitor the situation and apprise the Regional Board of progress.

9. City of San Diego Completes Supplemental Environmental Projects Related to February 2000 Adobe Falls Sewage Spill *(Rebecca Stewart)*

The City of San Diego has reported the completion of the supplemental environmental projects funded through the Regional Board's assessment of civil liability against the City in response to the February 2000 Adobe Falls sewage spill. In August and September 2004 the Regional Board inspected four of the project sites, including: Restoration of Adobe Falls Open Space Park, Alvarado Canyon Mitigation, Restoration of Chaparral Canyon Area and a project test site within the San Diego River Master Plan SEP, to verify that the completed activities and ongoing maintenance fully comply with the scope of each project as approved by the Regional Board.

Each of the projects involved the removal of non-native plant species and replanting with native species. At this early stage, the projects appear remarkably successful in changing and improving the project areas. Evidence of ongoing maintenance work was also evident at each site. The projects appeared to be conducted in accordance with the SEP applications as required, and have the potential to slow the spread of invasive plant species in the San Diego River watershed.

The City of San Diego will be invited to provide a status report to the Regional Board in near future.

10. Pioneer Builders, Inc., Begins Paying $73,750 Administrative Civil Liability Payment *(Rebecca Stewart)*
On August 14, 2004 Pioneer Builders (now known as Castillo del Mar Development, Inc.) began paying the $73,750 assessment for liability in Administrative Civil Liability Order No. R9-2003-0301 adopted in November 2003 for violations of the statewide construction stormwater NPDES permit, the Basin Plan, and Cleanup and Abatement Order No. R9-2003-0158. Castillo del Mar Development, Inc. has remitted three quarters of the assessed amount ($55,312.50) in two payments. Payments began after the State Board dismissed Pioneer's petition in July 2004. The Regional Board expects Pioneer to pay the remaining $18,437.50 by October 15, 2004.

11. City of Escondido, Hale Avenue Resource Recovery Facility, Pending Mandatory Minimum Penalties *(Rebecca Stewart)*
Beginning in May and continuing into August 2004, the City of Escondido's Hale Avenue Resource Recovery Facility reported 340 violations of effluent limitations contained in Regional Board Order No. 99-72. As of August 15, 2004 there are at least 187 violations subject to $561,000 in mandatory minimum penalties pursuant to Water Code section 13385.

The City reports that on April 17 and 25, and again on May 1, 2004 they detected what appeared to be a toxic discharge into the plant causing upset conditions in the aeration and secondary treatment processes which killed off the activated sludge organisms that are part of the biological treatment process. The result was the violation of carbonaceous biochemical oxygen demand (CBOD) and total suspended solids (TSS) effluent limitations.

The Regional Board is currently reviewing the City's reports and explanation for the violations. The matter will be brought before the Regional Board at a future meeting.

12. Quarterly Enforcement Report January – March 2004 *(Mark Alpert) (Attachment B-12)*
In accordance with the State Water Resource Control Board's Enforcement Policy, the Regional Board has prepared a detailed list of all the violations and the enforcement actions initiated during the period January through March 2004. The report was prepared using data from the SWIM (System for Water Information Management) Compliance Module, a database maintained by the State Water Resources Control Board[1]. The

Violation Report includes: a) the date of violation; b) the RWQCB response and date, if any; and c) the corrective action taken by the discharger. The 105-page report is posted on the Regional Board's Internet web page at http://www.swrcb.ca.gov/rwqcb9/. A legend describing the acronyms used to describe violations and enforcement actions is provided as an attachment to this report (Attachment B-12).

Violations are discovered through detailed reviews of discharger monitoring reports; field inspections of regulated facilities; in response to complaints or referrals from other agencies; discharger notification of spills and leaks (sewage spills are discussed under a separate heading); and discharger failure to submit timely monitoring reports or payment of annual fees associated with WDR/NPDES permits.

During the reporting period the Regional Board initiated 129 enforcement actions on 392 violations by 119 discharger/facilities. The following summarizes the type and number of enforcement actions, listed from informal to formal, initiated during the reporting period compared to the number of violations.

Progressive Enforcement ↓

Enforcement Action	Symbol	Number	No. of Violations
Staff Enforcement Letter/Verbal	SEL	55	96
Notice of Violations	NOV	32	204
Notice to Comply	NTC	20	18
13267 Order/letter	LTR	10	39
Cleanup and Abatement Order	CAO	2	2
Administrative Civil liability Complaint w/Mandatory Minimum Penalties	MPC	8	28
Administrative Civil liability Orders w/Mandatory Minimum Penalties	MPO	2	5
Total Enforcement Actions		129	392

[1] Enforcement information for the Underground Tanks, Department of Defense, and Spills, Leaks, Investigations, and Cleanup (SLIC) programs are not routinely stored in SWIM. Instead these programs use a database referred to as Geotracker, which is also maintained by the State Board. While SWIM was intended to be the primary database for this agency, Geotracker has emerged as the preferred database for some programs. More information on Geotracker is provided on the State Board web site at http://geotracker.swrcb.ca.gov.

13. City of Encinitas Concludes Successful Illicit Discharge Investigation *(Christopher Means)*

The City of Encinitas successfully completed an investigation to identify and eliminate a major source of pollution to Encinitas Creek. The investigation was initiated last August

when the City's dry weather monitoring detected elevated levels of Ammonia-Nitrogen (NH3-N), and surfactants (MBAS) in a storm drain, which discharges to Encinitas Creek. Further investigation tracked the source of these pollutants to a shopping center further upstream, where a noticeable sewage odor was detected. Utilizing many of the tools at their disposal, including GIS-based MS4 maps, vactor trucks, field sampling and lab analysis, closed circuit television camera, and dye testing, the City was able to pinpoint the source of the pollutants to a single restaurant within the shopping center.

In coordination with the San Diego County Department of Environmental Health, the City found two of the restaurant's bathrooms, as well as its grease interceptor and kitchen drains were illegally connected to the storm drain system. The connections were repaired within 24 hours of their discovery. The City billed the owners to recover the costs of the investigation and issued them a citation for $100.00.

The City estimated that approximately 198,000 gallons of polluted water had been discharged to the MS4, and eventually to Encinitas Creek and Batiquitos Lagoon. The Regional Board commended the City for their determination and perseverance in the investigation, resulting in the detection and elimination of this significant source of pollutants. The City's efforts are an example of how the Copermittees are utilizing their dry weather monitoring data to eliminate illicit discharges and illegal connections in accordance with the requirements of Order No. 2001-01.

PART C
STATEWIDE ISSUES OF IMPORTANCE TO THE SAN DIEGO REGION

There are no items to report in Part C this month.